

VOLKSWAGEN GROUP OF AMERICA
CHATTANOOGA OPERATIONS, LLC,

Plaintiff,

V.

SAARGUMMI TENNESSEE, INC.,

Defendants.

CASE NO. 1:22-CV-191

Judge Atchley

Magistrate Judge Steger

**SECOND JOINT MOTION TO CONTINUE HEARING
ON PRELIMINARY INJUNCTION**

Plaintiff Volkswagen Group of America Chattanooga Operations, LLC ("VW"), and Defendant SaarGummi Tennessee, Inc. ("SaarGummi") (collectively, the "Parties") respectfully move for a second continuance of the hearing (the "Hearing") on the VW's Motion for Preliminary Injunction (Doc. 3) set for August 2, 2022 at 2 p.m. (Doc. 16).

On July 29, 2022, the Parties memorialized in writing a Letter of Intent, which gives the Parties and their affiliates until the end of August to come to, *inter alia*, an agreement as to proposed payments to SaarGummi relating to the Parts, and an agreement for go-forward pricing and continued supply of the Parts contingent on reaching agreement as to, *inter alia*, the certain payments to SaarGummi relating to the Parts. Therefore, the Parties request a continuance of the Hearing until September 1, 2022, or as soon thereafter as counsel can be heard. VW has already filed supplemental briefing on its Motion, and SaarGummi will file its response by 5 p.m. today. The Parties agree that on Monday, August 29, 2022 by 5 p.m., or three business days before the Hearing, whichever comes later, VW and SaarGummi may file supplemental briefs addressing

any new issues that arise and shall exchange copies of all exhibits each side intends to introduce into evidence at the Hearing.

WHEREFORE, the Parties respectfully request that this Court grant the Parties' motion and (a) adjourn the Hearing to September 1, 2022, or to a date as soon thereafter as counsel can be heard, and (b) set a deadline of 5 p.m. three business days before the Hearing for the parties to file supplemental briefs and exchange copies of all exhibits each side intends to introduce into evidence at the Hearing.

This the 29th day of July, 2022.

Respectfully submitted,

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~ And ~

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CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2022, a copy of the foregoing **SECOND JOINT MOTION TO CONTINUE HEARING ON PRELIMINARY INJUNCTION** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

By: /s/Catherine Dorvil